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COUNSEL FOR THE TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

| IN RE: | § . |
|---|------------------------------|
| NOC, INC., | § Case No. 23-40255-elm |
| Debtor. | <pre> § Chapter 11 § 8</pre> |
| DANIEL J. SHERMAN, AS | § § |
| LIQUIDATING TRUSTEE FOR THE LIQUIDATING TRUST OF NOC, | |
| INC., | § § § § |
| Plaintiff, | § |
| v. | § Adv. No. 25-04024-elm |
| U.S. PECANS, LTD. | § § |
| Defendant. | \$ \$ \$ |

STIPULATION FOR AN EXTENSION OF TIME TO ANSWER, MOVE OR OTHERWISE REPLY

TO THE HONORABLE EDWARD L. MORRIS, UNITED STATES BANKRUPTCY JUDGE:

Daniel J. Sherman, in his capacity as the liquidating trustee (the "Trustee") for the Liquidating Trust of NOC, Inc., Plaintiff herein, and U.S. Pecans, Ltd., the Defendant herein (the

"Defendant"), by and through their undersigned counsel, file this *Stipulation for an Extension of Time to Answer, Move or Otherwise Reply*, and respectfully state as follows:

- 1. On January 30, 2025, the Trustee initiated the above-referenced adversary proceeding against the Defendant by filing a Complaint [Docket No. 1].
- 2. The summons was issued on January 31, 2025 [Docket No. 2] and the Defendant's answer or responsive pleading is due on March 3, 2025 (the "Deadline").
- 3. The Trustee and the Defendant have agreed to extend the Deadline to answer, move or otherwise reply to Plaintiff's Original Complaint with respect to the Defendant until April 2, 2025.
- 4. The Trustee and Defendant request that the Court take notice of this Stipulation and extend the Deadline. This deadline extension is without prejudice to the Defendant seeking a further extension of the Deadline by agreement or otherwise.

DATED this 26th day of February, 2025.

STIPULATED AND AGREED:

/s/ Eric T. Haitz

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By: /s/ Harrel L. Davis

Harrel L. Davis III State Bar No. 05567560 Attorneys for Defendant